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May 27, 2025

**By ECF**

Honorable Robert W. Lehrburger  
United States Magistrate Judge  
Southern District of New York  
500 Pearl Street  
New York, NY, 10007

Re: Ali Moore v. City of New York, et al.,  
22 Civ. 10957 (LGS) (RWL)

Your Honor:

Defendants City of New York and New York City Health + Hospitals respectfully submit this joint status letter pursuant to the Case Management Plan and Scheduling Order dated February 26, 2025.

The undersigned writes to inform the Court that both the City and New York City Health + Hospitals Corporation Defendants served their initial disclosures on April 1, 2025, as required by the Civil Case Management Plan and Scheduling Order. To date, Plaintiff has not served initial disclosures. Defense counsel for the City most recently contacted Plaintiff regarding his outstanding disclosures on May 22, 2025, but has not received a response. Should Plaintiff fail to respond to the City's inquiring regarding his initial disclosure, it will seek intervention of the Court. No other significant case activity has occurred since entry of the Scheduling Order. The April 30, 2025 deadline for joining additional parties and filing amended pleadings has passed without any such motions being filed.

Defense counsel solicited Plaintiff's input for this joint status letter via email earlier today but did not receive a response in time for this submission. Should Plaintiff wish to provide additional information or corrections, defendants will submit a supplemental letter to the Court.

The Defendants thank the Court for its time and consideration.

Respectfully submitted on behalf of  
the Defendants,

Joseph Zangrilli /s/

Joseph Zangrilli

Attorney for Defendants City,

Bajnauth Castellucio, Castro,

Maldonado, Nivar s/h/a Patricio,

and Rosas

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Cc: **VIA FIRST CLASS MAIL AND EMAIL**

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**VIA ECF**

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